



THE QUALITY CHICKEN PEOPLE

ALLEN FAMILY FOODS, INC.

P.O. Box 63

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HARBESON, DE 19951

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RECEIVED

DEC 16 2009

December 14, 2009

SURFACE WATER

Mr. Glenn F. Davis, Program Manager  
Department of Natural Resources and Environmental Control  
Division of Water Resources  
Surface Water Discharges Section  
89 Kings Highway  
Dover, Delaware 19901

Re: Compliance Sampling & Inspection (CSI) – October 14, 2009  
NPDES Permit No. DE-0000299

Dear Mr. Davis:

Allen Family Foods, Inc. is in receipt of your letter dated October 15, 2009 that was received by us on November 21, 2009 in regard to the referenced Compliance Sampling & Inspection (CSI). Please accept the following as our response to the findings of the inspection.

1. The composite sampler is set up to sample over a 24 hour period starting at midnight and ending the following midnight. When the sampler is set up ice is a standard procedure to ensure the temperature requirements of the sample being collected. At the time of the split sampling for the CSI the sample was collected for EnviroCorp Labs to analyze and placed in the refrigerator for pick up the next day. The remainder of the sample was left in the sampler for Chris Cleaver to pick up the next day. The ice had melted by the time Mr. Cleaver arrived to pick up the sample causing the temperature of the sample to be above the acceptable limit. The sampler was set up for a second sample with additional ice to ensure the sample would be acceptable for pick up the next day.
2. A revised procedure for verifying the composite sampler aliquot is being developed to meet the requirements outlined in your letter. A sheet will be developed that will show the volume of at least 4 samples and the average of those samples to be reported. The new sheet will be set up to show the operator performing the procedure and will include a signature and date. This revised procedure will be implemented for the December, 2009 aliquot verification and will continue as required.
3. A Hach DR-890 colorimeter is used for the daily chlorine residual testing required under our permit. At the time of the CSI it was noted that our DR-

890 cell that holds the small glass test tubes was not as clean as it should be. Your letter also states that our glass tubes were very dirty. It is our practice to clean these test tubes after every use and replace them if they become discolored or scratched. I contacted Hach regarding the cleaning procedures for the colorimeter and they stated that glass cleaner should be used with the wiping of the inside to be done with a laboratory grade "Kimwipe" to ensure that lint will not be left in the cell during the cleaning process. This procedure has been implemented and new test tubes have been ordered.

4. As stated in your letter, Mr. Chris Cleaver arrived at the Harbeson wastewater plant on October 15<sup>th</sup> to pick up the composite sample to be split with EnviroCorp Labs. At this time Mr. Cleaver noticed that our effluent "was very cloudy and did not look normal." After investigation by our staff it was determined that our storm water holding tank was overflowing and mixing with the final effluent from the treatment plant. It was discovered that the drain valve in the tank was plugged. By exercising the valve, the plug disappeared and the tank immediately began to drain stopping the overflow to the final effluent.

In the future, to prevent occurrences of this nature, regular checks of the storm water tank are being made during rain events. Also, the drain valve is kept in a full open position minimizing the chance of plugging. No further problems have been experienced since the event of October 15<sup>th</sup> and there have been several rain events.

If you should have any questions, please let me know.

Respectfully submitted,  
ALLEN FAMILY FOODS, INC.



Michael R. Sausé  
Wastewater Manager

Cc: Tom Brinson, Corporate Environmental Manager  
Rob Bacon, Senior Wastewater Manager